

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TIM SHEETS)	
5091 Buchanan Road)	
Waterford, Ohio 45786)	
)	
Plaintiffs,)	No. 2:09-cv-01064-ALM-MRA
)	
vs.)	PLAINTIFF'S REQUEST FOR
)	DEFAULT JUDGMENT
AMERICAN CREDIT &)	
COLLECTIONS, LLC)	
520 Pusey Street)	
Collingdale, PA 19023)	
)	
Defendant.)	

NOW COMES the Plaintiff, TIM SHEETS, by and through his attorney, KROHN & MOSS, LTD., and hereby requests a default judgment against Defendant, AMERICAN CREDIT & COLLECTIONS, LLC. The Clerk of the Court has entered an order on Plaintiffs' Application (See Exhibit A), leaving this Honorable Court to grant Plaintiffs' Application.

Plaintiff seeks default against Defendant in the amount of three thousand five hundred eleven dollars and seventy cents (\$3,511.70), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. § 1692(k)(a)(2)(A), two thousand one hundred sixteen dollars and seventy cents (\$2,116.70) in attorney fees plus three hundred and ninety-five dollars (\$395.00) in costs (filing fee and service). 15 U.S.C. § 1692(k)(a)(3) (see statement of services and declarations attached hereto as Exhibits B and C).

//

Dated: March 2, 2010

By: /s/ Peter Cozmyk
Peter Cozmyk
Attorney for Plaintiff

Ohio Registration No. 0078862
Krohn & Moss, Ltd.
3 Summit Park Drive
Suite 140
Independence, Ohio 44131
phone: (216) 901-0609
fax: (866) 425-3459
e-mail: pcozmyk@consumerlawcenter.com

EXHIBIT A

EXHIBIT B

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TIM SHEETS
5091 Buchanan Road
Waterford, Ohio 45786

Plaintiffs,

VS.

AMERICAN CREDIT &
COLLECTIONS, LLC
520 Pusey Street
Collingdale, PA 19023

Defendant.

No. 2:09-cv-01064-ALM-MRA

DECLARATION IN SUPPORT OF
PLAINTIFF'S REQUEST FOR DEFAULT
JUDGMENT

1. I am competent to testify in a court of law and if called to do so would testify as specified herein.
2. I am one of Plaintiff's attorneys in this matter and was retained to represent Plaintiff in a Fair Debt Collections Practices Act ("FDCPA") claim against Defendant.
3. Pursuant to the FDCPA, Plaintiff is entitled to statutory damages of up to one thousand dollars, attorney fees and court costs if Plaintiff prevails.
4. Defendant's failure to answer the instant complaint constitutes and acquiescence to the merits of the Complaint and that Plaintiff has prevailed herein.
5. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's case.
6. That each of these time entries truly and accurately reflect the services I performed representing Plaintiff in this case.

7. The time entries were recorded in the ordinary course of business at Krohn & Moss, Ltd. ~~b~~ entering each entry into a computer database, Amicus Attorney.
8. The time entries recorded in this case were made contemporaneous to the tasks ~~performed~~
9. That the time incurred on each entry was reasonably and necessarily incurred.

Pursuant to 28 U.S.C. § 1746(2), I, Peter J. Cozmyk, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

DATED: April 1, 2010

KROHN & MOSS, LTD.

By: /s/ Peter J. Cozmyk
APeter J. Cozmyk,
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TIM SHEETS
5091 Buchanan Road
Waterford, Ohio 45786

Plaintiffs,

VS.

AMERICAN CREDIT &
COLLECTIONS, LLC
520 Pusey Street
Collingdale, PA 19023

Defendant.

No. 2:09-cv-01064-ALM-MRA

DECLARATION IN SUPPORT OF
PLAINTIFF'S REQUEST FOR DEFAULT
JUDGMENT

5. I am competent to testify in a court of law and if called to do so would testify as specified herein.
6. I am one of Plaintiff's attorneys in this matter and was retained to represent Plaintiff in a Fair Debt Collections Practices Act ("FDCPA") claim against Defendant.
7. Pursuant to the FDCPA, Plaintiff is entitled to statutory damages of up to one thousand dollars, attorney fees and court costs if Plaintiff prevails.
8. Defendant's failure to answer the instant complaint constitutes and acquiescence to the merits of the Complaint and that Plaintiff has prevailed herein.
5. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's case.
6. That each of these time entries truly and accurately reflect the services I performed representing Plaintiff in this case.

7. The time entries were recorded in the ordinary course of business at Krohn & Moss, Ltd. by entering each entry into a computer database, Amicus Attorney.
8. The time entries recorded in this case were made contemporaneous to the tasks performed.
9. That the time incurred on each entry was reasonably and necessarily incurred.

Pursuant to 28 U.S.C. § 1746(2), I, Nicholas J. Bontrager, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

DATED: April 1, 2010

KROHN & MOSS, LTD.


By: /s/ Nicholas J. Bontrager
Nicholas J. Bontrager,
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

REQUEST FOR DEFAULT JUDGMENT

TIM SHEETS)	
5091 Buchanan Road)	
Waterford, Ohio 45786)	
)	
Plaintiffs,)	No. 2:09-cv-01064-ALM-MRA
)	
vs.)	DECLARATION IN SUPPORT OF
)	PLAINTIFF’S REQUEST FOR DEFAULT
AMERICAN CREDIT &)	JUDGMENT
COLLECTIONS, LLC)	
520 Pusey Street)	
Collingdale, PA 19023)	
)	
Defendant.)	

- 1 I am competent to testify in a court of law and if called to do so would testify as specified herein.
- 2 I am the managing Partner of the law firm Plaintiff retained to represent them in a Fair Debt Collections Practices Act (“FDCPA”) claim against Defendant.
- 3 Pursuant to the FDCPA each Plaintiff is entitled to statutory damages of up to one thousand dollars, attorney fees and court costs if Plaintiff prevails.
- 4 Defendant’s failure to answer the instant complaint constitutes and acquiescence to the merits of the Complaint and that Plaintiff has prevailed herein.
5. That the time entries bearing my name represent the actual hours I spent working on Plaintiff’s case.
6. That each of these time entries truly and accurately reflect the services I performed in this case.

7. I have also reviewed the time entries incurred in this case that bear the names of other attorneys and personnel from my firm. I am familiar with these time entries as I managed/supervised this case and I managed/supervised our bill.
8. The time entries were recorded in the ordinary course of business at Krohn & Moss, Ltd.  entering each entry into a computer database, Amicus Attorney.
9. The time entries recorded in this case were made contemporaneous to the tasks performed.
10. That the time incurred on each entry was reasonably and necessarily incurred.
11. I am familiar with the attorneys and/other personnel that performed work on this case and the Attorney's Fees and Costs in this case accurately states time spent on the case.

Pursuant to 28 U.S.C. § 1746(2), I, Adam J. Krohn, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

DATED: April 1, 2010

KROHN & MOSS, LTD.

By: /s/ Adam J. Krohn
Adam J. Krohn,
Managing Partner

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business Address is 10474 Santa Monica Boulevard, Suite 401, Los Angeles, California 90025.

On April 1, 2010, I served the following document(s) described as: **REQUEST FOR DEFAULT JUDGMENT**, on all interested parties in this action by placing:

[X] a true copy

American Credit & Collections, LLC
921 Oak St
Scranton, PA 18508
Defendant

[X] BY MAIL

[X] I am readily familiar with the firm's practice for collection and processing correspondence for mailing. Under that practice, this document will be deposited with the U.S. Postal Service on this date with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] STATE – I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 1, 2010, at Los Angeles, California.

By: /s/ Nicholas J. Bontrager
Nicholas J. Bontrager